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15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 BRIAN BORENSTEIN, an individual,  
18  
19 Plaintiff,

20 vs.

21 THE ANIMAL FOUNDATION, a domestic  
22 nonprofit corporation; *et al.*  
23 Defendants.

Case No.: 2:19-cv-00985-APG-DJA

**STIPULATION AND [PROPOSED]  
ORDER FOR PLAINTIFF TO RESPOND  
TO [ECF 66] DEFENDANTS SUNRISE  
HOSPITAL AND MEDICAL CENTER  
AND ULRIKE PASTERNAKS' MOTION  
TO DISMISS FIRST AMENDED  
COMPLAINT AND [ECF 68] MOTION  
TO DISMISS FIRST AMENDED  
COMPLAINT BY DEFENDANTS  
COUNTY OF CLARK AND  
VICTOR ZAVALA**

**(First Request)**

26 COMES NOW Plaintiff, BRIAN BORENSTEIN, by and through his counsel, Raelene  
27 K. Palmer, Esq. of The Palmer Law Firm, P.C., and Robert S. Melcic, Esq., and Defendants,  
28 SUNRISE HOSPITAL AND MEDICAL CENTER, LLC and ULRIKE PASTERNAK, by and

1 through their counsel, Stephanie J. Glantz, Esq., of the law firm Bailey Kennedy, and  
2 COUNTY OF CLARK, and VICTOR ZAVALA, by and through their counsel, Jonathan D.  
3 Blum, Esq., of the law firm Wiley Petersen, and hereby request the Court to extend the  
4 deadlines for Plaintiff to respond to [ECF 66] *Defendants Sunrise Hospital and Medical Center*  
5 *and Ulrike Pasternaks' Motion to Dismiss First Amended Complaint* and [ECF 68] *Motion to*  
6 *Dismiss First Amended Complaint by Defendants County of Clark and Victor Zavala* from  
7 **Friday, August 14, 2020 to Friday, September 25, 2019.**

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The parties submit that this request is made in good faith and not for the purpose of undue delay but is related to caseload and calendaring issues recently experienced by counsel for the plaintiff.

DATED this 12th day of August 2020.

THE PALMER LAW FIRM, P.C.

By: / s / **Raelene K. Palmer**

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DATED this 12th day of August 2020.

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DATED this 12th day of August 2020.

BAILEY KENNEDY

By: / s / **Stephanie J. Glantz**

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Ulrike Pasternak*

DATED this 12th day of August 2020.

WILEY PETERSEN

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*Attorneys for Defendants, County of  
Clark and Victor Zavala*

### **ORDER**

IT IS SO ORDERED. The response deadline is September 25, 2020.

DATED: August 14, 2020, 2020.



UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on August 13, 2020, I caused to be served a copy of the foregoing *Stipulation and [Proposed] Order for Plaintiff to Respond to [ECF 66] Defendants Sunrise Hospital and Medical Center and Ulrike Pasternaks' Motion to Dismiss First Amended Complaint and [ECF 68] Motion to Dismiss First Amended Complaint by Defendants County of Clark and Victor Zavala (First Request)*, by electronic filing through the Court's CM/ECF system, addressed to:

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